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Attorneys for Defendants

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

SHIMENG GAO,

Plaintiff,

v.

KRISTI NOEM, in her official capacity as
Secretary of the United States Department of
Homeland Security, *et al.*

Defendants.

C 5:25-cv-01479 SVK

**STIPULATION TO STAY PROCEEDINGS;
~~[PROPOSED]~~ ORDER**

The parties, through their undersigned attorneys, hereby stipulate and respectfully request the Court to stay proceedings in this case for a limited time, until July 21, 2025. The parties make this joint request because they are pursuing an administrative resolution that may render further litigation of this case unnecessary.

Plaintiff filed this action seeking adjudication of his Form I-485, Application to Register Permanent Residence of Adjust Status. United States Citizenship and Immigration Services (“USCIS”) scheduled an interview on Plaintiff’s Form I-485 application for May 21, 2025. USCIS will work diligently towards completing adjudication of Plaintiff’s application, absent unforeseen or exceptional circumstances that would require additional time for adjudication.

Accordingly, the parties stipulate and request that the proceedings in this case be stayed until July 21, 2025, at which time the parties will file a joint status report with the Court. At that time, the parties may request a further continuance of the stay of proceedings, dismissal of the litigation if appropriate, or placement of the case back on the Court's active docket. A stay of proceedings in this case will benefit the parties and conserve the Court's resources while the parties pursue a potential administrative resolution.

Dated: April 25, 2025

Respectfully submitted¹,

PATRICK D. ROBBINS
Acting United States Attorney

/s/ Elizabeth D. Kurlan
ELIZABETH D. KURLAN
Assistant United States Attorney

Attorneys for Defendants

Dated: April 25, 2025

/s/ Angela Warren
ANGELA WARREN
Warren Law Firm, P.C.

SUSAN J. COFANO
Law Office of Susan Cofano

Attorneys for Plaintiff

~~PROPOSED~~ ORDER

Pursuant to stipulation, IT IS SO ORDERED.

Date: April 28, 2025


SUSAN VAN KEULEN
United States Magistrate Judge

¹ In accordance with Civil Local Rule 5-1(i)(3), the filer of this document attests that all signatories listed herein concur in the filing of this document.